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25 SINCLAIR YAKIMA LICENSEE, LLC, KEYE LICENSEE, LLC,  
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LICENSEE, LLC, KTUL LICENSEE, LLC, KTVL LICENSEE, LLC,  
KTVO LICENSEE, LLC, KUTV LICENSEE, LLC, KVII LICENSEE,  
LLC, WACH LICENSEE, LLC, WFXL LICENSEE, LLC, WGXA  
LICENSEE, LLC, WJAR LICENSEE, LLC, WKRC LICENSEE, LLC,  
WLUK LICENSEE, LLC, WNWO LICENSEE, LLC, WOAI  
LICENSEE, LLC, WPBN LICENSEE, LLC, WPDE LICENSEE,  
LLC, WSET LICENSEE, LLC, WSTQ LICENSEE, LLC, WTOV  
LICENSEE, LLC, WTVC LICENSEE, LLC, WZTV LICENSEE, LLC

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**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEVADA**

BRITTNEY GOBBLE PHOTOGRAPHY, LLC,

Plaintiff,

vs.  
SINCLAIR PORTLAND LICENSEE, LLC, ET.  
AL.

Defendants.

Case No. 2:18-cv-02096-RFB-PAL

**JOINT STIPULATION TO TRANSFER  
CASE TO THE U.S. DISTRICT COURT  
OF MARYLAND AND PROPOSED  
ORDER**

1                   Defendants Sinclair Portland Licensee, LLC, KATV Licensee, LLC, Sinclair Bakersfield  
2 Licensee, LLC, Sinclair Boise Licensee, LLC, Sinclair Eugene Licensee, LLC, Sinclair Yakima  
3 Licensee, LLC, KEYE Licensee, LLC, KGBT Licensee, LLC, KHQA Licensee, LLC, Sinclair  
4 Lewiston Licensee, LLC, Sinclair Seattle Licensee, LLC, Sinclair Radio of Seattle Licensee, LLC,  
5 KRCG Licensee, LLC, KTUL Licensee, LLC, KTVL Licensee, LLC, KTVO Licensee, LLC,  
6 KUTV Licensee, LLC, KVII Licensee, LLC, WACH Licensee, LLC, WFXL Licensee, LLC,  
7 WGXA Licensee, LLC, WJAR Licensee, LLC, WKRC Licensee, LLC, WLUK Licensee, LLC,  
8 WNWO Licensee, LLC, WOAI Licensee, LLC, WPBN Licensee, LLC, WPDE Licensee, LLC,  
9 WSET Licensee, LLC, WSTQ Licensee, LLC, WTOV Licensee, LLC, WTVC Licensee, LLC,  
10 WZTV Licensee, LLC, and Grey Television Licensee, LLC (“Defendants”)<sup>1</sup> and Plaintiff Brittney  
11 Gobble Photography, LLC mutually stipulate and move this Court for an Order to transfer this case  
12 to the U.S. District Court of Maryland pursuant to 28 U.S.C. section 1404, based upon the  
13 following:

14                   1. Plaintiff filed its Complaint on October 31, 2018. With the sole exception of Gray  
15 Television Licensee, LLC, see note 1 below, Defendants served their Answer on January 8, 2019.

16                   2. Plaintiff also filed cases in Maryland and Delaware involving related parties and the same  
17 copyrighted images at issue here. The Maryland cases are: Case No. 1:18-cv-03384-RDB and  
18 Case No. 1:18-cv-03403-RDB (“Maryland U.S. Dist. Court Cases”), which have now been  
19 consolidated by order of Judge Richard Bennett. See Ex. 1 (ECF 23)

20                   3. The Delaware case filed by the Plaintiff is: Case No. 1:18-cv-01720-MN, which the parties  
21 thereto anticipate transferring and consolidating with the Maryland U.S. Dist. Court Cases.

22                   4. Based upon the issues raised and parties involved in all cases, and for the consolidation of  
23 the involved parties and witnesses, and in the interest of justice, all Parties to this action have  
24 mutually agreed to have this Court transfer this Case to the U.S. District Court of Maryland so it  
25 can be consolidated with the Maryland U.S. Dist. Court Cases under lead Case No. 1:18-cv-03403-RDB.

26                   5. Upon completion of this transfer, Case No. 2:18-cv-02096-RFB-PAL shall be considered

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27                   <sup>1</sup>Undersigned counsel files this Stipulation on behalf of all parties, including GRAY TELEVISION  
28 LICENSEE, LLC, whose Answer is filed contemporaneously herewith.

closed and all relevant documents shall be included with said transfer.

6. The Parties agree to comply with all Local Rules as required by the U.S. District Court of Maryland.

## **MEMORANDUM OF POINTS AND AUTHORITIES**

28 U.S.C. section 1404 addresses the issue of Change of Venue and states in relevant part:

(a) For the convenience of parties and witnesses, in the interest of justice, a district court may transfer any civil action to any other district or division where it might have been brought or to any district to which all parties have consented.

As stated, the parties to this action have discussed the efficiency and appropriateness of transferring the matter to the U.S. District Court of Maryland where Sinclair Broadcast Group, Inc. has its corporate headquarters. Based upon the issues and the parties involved in all cases, and for the consolidation of the involved parties and witnesses, and in the interest of justice, the Parties have mutually consented to have this Court transfer this case to the U.S. District Court of Maryland so that it can be consolidate under lead Case No. 1:18-cv-03403-RDB.

Accordingly, the parties have agreed that the intent of 28 U.S.C. 1404(a) is applicable to the facts set forth and that the case against Defendants should be transferred to U.S. District Court of Maryland, to be combined with Case Nos. Case No. 1:18-cv-03384-RDB and Case No. 1:18-cv-03403-RDB and consolidated under lead Case No. 1:18-cv-03403-RDB, so as to have the entire matter heard in the same Court in the interest of justice.

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19 *Attorneys for Plaintiff*

20 *Attorney for Defendants*

21 **ORDER**

22 The Court finds that the above-named parties have mutually agreed to transfer this case to  
23 the U.S. District Court of Maryland to be consolidated under lead Case No. No. 1:18-cv-03403-  
24 RDB. This Court grants the Parties' Stipulation as presented in accordance with 28 U.S.C. section  
25 1404(a).

26 **IT IS SO ORDERED.**



27 RICHARD F. BOULWARE, II  
28 UNITED STATES DISTRICT JUDGE

29 DATED this 22nd day of February, 2019.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **JOINT STIPULATION TO TRANSFER CASE TO THE U.S. DISTRICT COURT OF MARYLAND AND PROPOSED ORDER** was electronically served on counsel of record this 20<sup>th</sup> day of February, 2019, using the Court's CM/ECF System.

/s/ Faith B. Radford  
An Employee of Evans Fears & Schuttet LLP

## **EXHIBIT 1**

**U.S. District Court of Maryland**  
**Baltimore Division**  
**Case No. 1:18-cv-03403-RDB**  
**Case No. 1:18-cv-00384-RDB**  
**Order Consolidating Cases**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
BALTIMORE DIVISION**

BRITTNEY GOBBLE PHOTOGRAPHY, LLC, \*  
Plaintiff, \*  
v. \* Case No. 1:18-CV-03384-RDB  
KABB LICENSEE, LLC, *et al.*, \* Case No. 1:18-CV-03403-RDB  
Defendants/Third-Party Plaintiffs, \*  
v. \*  
USA ENTERTAINMENT NEWS, INC., \*  
d/b/a "WENN" and "WORLD \*  
ENTERTAINMENT NEWS NETWORK" \*  
Third-Party Defendants. \*  
\* \* \* \* \* \* \* \* \* \* \* \* \* \* \*  
BRITTNEY GOBBLE PHOTOGRAPHY, LLC \*  
Plaintiff, \*  
v. \*  
SINCLAIR BROADCAST GROUP, INC. \*  
Defendant/Third-Party Plaintiff, \*  
v. \*  
USA ENTERTAINMENT NEWS, INC., \*  
d/b/a "WENN" and "WORLD \*  
ENTERTAINMENT NEWS NETWORK" \*  
Third-Party Defendant \*  
\* \* \* \* \* \* \* \* \* \* \* \* \* \* \*

**ORDER**

Upon consideration of the request to consolidate the two above-captioned civil actions set forth in correspondence with this Court, dated December 26, 2018 (ECF 21), by Plaintiff Brittney Gobble Photography, LLC and Defendant Sinclair Broadcast Group, Inc., as parties to Case No. 1:18-CV-03403-RDB, and Plaintiff Brittney Gobble Photography, LLC and Defendants KABB Licensee, LLC, KOKH Licensee, LLC, Chesapeake Television Licensee, LLC, Birmingham (WABM-TV) Licensee, Inc., WGME Licensee, LLC, WICS Licensee, LLC, Portland (WPFO-TV) Licensee, Inc., WSYX Licensee, LLC and Columbus (WTTE-TV) Licensee, Inc., as parties to Case No. 1:18-CV-03403-RDB, pursuant to Fed. R. Civ. P. 42 (a)(2), it is, this 10th day of January, 2019, hereby

**ORDERED** Case No. 1:18-CV-03384-RDB and Case No. 1:18-CV-03403-RDB are consolidated for all further proceedings. Case No. 1:18-CV-03403-RDB is designated as the lead case. All future filings for the two above-captioned actions shall be made in the lead case.

  
The Honorable Richard D. Bennett  
U.S. District Court, District of Maryland